




**THE CITY OF NEW YORK
LAW DEPARTMENT**

100 CHURCH STREET
NEW YORK, NY 10007

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

MEMO ENDORSED


HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE
DATED: April 15, 2024

The extension requested herein is granted.
The deadline for Defendant's Opposition
is now April 18, 2024. The deadline for
Plaintiff's Reply is now April 25, 2024.
The Clerk of Court is respectfully directed
to terminate the Motion at ECF No. 36.

Lauren Howland
Special Assistant Corporation Counsel
Office: (212) 356-2016

April 12, 2024

VIA ECF

Hon. Valerie Figueredo
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Z.C. v. N.Y.C. Dep't of Educ., 23-cv-8399 (JHR)(VF)

Dear Judge Figueredo:

I am a Special Assistant Corporation Counsel in the Office of Corporation Counsel, Hon. Sylvia O. Hinds-Radix, attorney for Defendants in the above-referenced action, wherein Plaintiff seeks attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request a three-day extension of the current briefing schedule, from April 15 to April 18, 2024, for Defendants time to submit their Opposition to the Plaintiff's Motion for Summary Judgment for Fees, and consequently, from April 22 to April 25 for Plaintiff's reply. Plaintiff consents to this request. This is the first request for an extension of these deadlines. The requested extension is needed because the undersigned's supervisor is out of the office due to illness and Defendants need time for an alternate supervisor to be fully apprised of the issues in the matter in order for Defendants to provide fulsome opposition to certain aspects of the fees motion.

Accordingly, Defendants respectfully request that the Court grant a three-day extension of the current briefing schedule, with Defendants' opposition due April 18 and Plaintiff's reply due April 25.

Thank you for considering this request.

Respectfully submitted,
/s/

Lauren Howland
Special Assistant Corporation Counsel

cc: Rebecca Caren Shore (via ECF)
cc: Kate Elizabeth Cassidy (via ECF)